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Attorneys for Defendant
JPMORGAN CHASE BANK, N.A.

IN THE UNITED STATES DISTRICT COURT
THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYNE CHAN, et al.,
Plaintiffs,

v.

JPMORGAN CHASE BANK, N.A.,
Defendant.

) Case No. 16-cv-02497

)

) **STIPULATION TO EXTEND TIME FOR**
) **DEFENDANT JPMORGAN CHASE**
) **BANK, N.A. TO RESPOND TO**
) **COMPLAINT PURSUANT TO CIVIL**
) **LOCAL RULE 6-1(a)**

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WHEREAS, on April 6, 2016, Plaintiffs filed this action against Defendant JPMorgan Chase Bank, N.A. ("Chase") in the California Superior Court, San Mateo County;

WHEREAS, May 9, 2016, Chase removed this action to this Court;

WHEREAS pursuant to Federal Rule of Civil Procedure 81, Chase's deadline to respond to the complaint would be May 16, 2016; and

WHEREAS, Chase requires additional time to investigate the allegations in the Complaint and to commence a dialogue with Plaintiffs regarding potential settlement;

NOW THEREFORE, Plaintiffs and Chase HEREBY STIPULATE AND AGREE AS FOLLOWS:

1. The deadline for Chase to answer, move, or otherwise respond to Plaintiffs' Complaint shall be extended up to and including June 16, 2016.

2. This stipulation will not alter the date of any event or any deadline already fixed by Court order.

IT IS SO STIPULATED.

DATED: May 12, 2016

DAVIS WRIGHT TREMAINE LLP
Joseph E. Addiego III
John D. Freed

By: /s/ John D. Freed
John D. Freed

Attorneys for Defendant
JPMORGAN CHASE BANK, N.A.

Dated: May 16, 2016

MELLEN LAW FIRM
Eunji Cho

By: /s/ Eunji Cho
Eunji Cho

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Attorneys for Plaintiffs



CERTIFICATION OF CONCURRENCE

Pursuant to L.R. 5-1, I hereby attest that Eunji Cho, counsel for Plaintiffs Wayne and Gladys Chan, has provided her concurrence in the electronic filing of the foregoing document entitled STIPULATION TO EXTEND TIME FOR DEFENDANT JPMORGAN CHASE BANK, N.A. TO RESPOND TO COMPLAINT PURSUANT TO CIVIL LOCAL RULE 6-1(a).

/s/ John D. Freed

John D. Freed